EXHIBIT O

Kathy Klein

From: Kathy Klein

Sent: Tuesday, December 12, 2023 11:08 AM

To: **Patrick Sanders**

Cc: Robert MacGill; Bundren, Brandon; Callas, Gretchen; John Jacobson; Nokes, Scarlett;

> Scott Klein; Scott Murray; Steve Mintz; Terence McCormick; Thomas J. Hurney, Jr. -Jackson Kelly PLLC (thurney@jacksonkelly.com); agoldstein@colelawgrouppc.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; tcole@colelawgrouppc.com;

tpresnell@bradley.com

Subject: RE: Hunt v. SBC, et al

We are available at 1 pm eastern on Thursday, but please note that Steve Mintz has a hard stop at 1:35 pm that day.



Katharine R. Klein

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From: Patrick Sanders <patrick.sanders@macgilllaw.com>

Sent: Tuesday, December 12, 2023 8:03 AM

To: Kathy Klein < KKlein@rjfirm.com>

Cc: Robert MacGill <robert.macgill@macgilllaw.com>; Bundren, Brandon

Sbundren@bradley.com>; Callas, Gretchen <gcallas@jacksonkelly.com>; John Jacobson <JJacobson@rjfirm.com>; Nokes, Scarlett <snokes@bradley.com>; Scott Klein <Klein@mintzandgold.com>; Scott Murray <Scott.Murray@macgilllaw.com>; Steve Mintz <mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com) <thurney@jacksonkelly.com>; agoldstein@colelawgrouppc.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; tcole@colelawgrouppc.com; tpresnell@bradley.com

Subject: Re: Hunt v. SBC, et al

Kathy,

We are available Thursday at 1:00pm Eastern. Please let us know if that works for your team and I will send out a zoom invite.

Patrick Sanders

Associate MacGill PC

Patrick.Sanders@MacGillLaw.com

w: 317-961-5390 m: 317-670-1557 www.MacGillLaw.com

EXHIBIT O

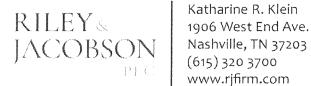
On Mon, Dec 11, 2023 at 11:19 AM Kathy Klein < KKlein@rjfirm.com > wrote:

Rob:

Steve Mintz is not available for a meet and confer until Thursday. Please let us know a time on Thursday that works for you. As to Hunt's "need" to begin motion to compel proceedings immediately, that certainly is your choice; however, Hunt's decision to wait until January to try to schedule any depositions of potential witnesses, including third-parties, has nothing to do with Guidepost.

I look forward to hearing from you.

Kathy



Katharine R. Klein 1906 West End Ave.

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From: Robert MacGill <robert.macgill@macgilllaw.com>

Sent: Saturday, December 9, 2023 6:24 AM

To: Kathy Klein < KKlein@rjfirm.com>

Cc: Bundren, Brandon

 Sbundren@bradley.com>; Callas, Gretchen <gcallas@jacksonkelly.com>; John Jacobson <JJacobson@rjfirm.com>; Nokes, Scarlett <<u>snokes@bradley.com</u>>; Scott Klein <<u>Klein@mintzandgold.com</u>>; Scott Murray <Scott.Murray@macgilllaw.com>; Steve Mintz <mintz@mintzandgold.com>; Terence McCormick < <u>McCormick@mintzandgold.com</u>>; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (<u>thurney@jacksonkelly.com</u>) <thurney@jacksonkelly.com>; agoldstein@colelawgrouppc.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; patrick.sanders@macgilllaw.com; tcole@colelawgrouppc.com; tpresnell@bradley.com

Subject: Re: Hunt v. SBC, et al

Thank you for your letter, Kathy.
Please let us know a time on Tuesday that works for you to meet and confer on these depositions. We are hopeful we can agree to a schedule on Tuesday. If not, we will pursue next steps in relation to a Motion to Compel the testimony on Wednesday morning.
Given the delays in the case stemming from the refusal of Guidepost to comply with basic discovery requirements, we understand the needs to pursue our rights.
Best regards.
Robert D. MacGill MacGill PC 156 E. Market St. Suite 1200 Indianapolis, IN 46260 317.442.3825 Robert.MacGill@MacGillLaw.com
P Please consider the environment before printing this email.
On Fri, Dec 8, 2023 at 9:01 PM Kathy Klein < KKlein@rjfirm.com > wrote: Counsel:
Attached is a letter regarding Plaintiff's Notices of Deposition for Guidepost's employees.
Kathy